

PATRICK L. FORTE, #80050
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Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 17-40042 RLE

SHARON YVETTE BURNS,

Chapter 7

Debtor.

**DECLARATION OF PATRICK L. FORTE
IN SUPPORT OF APPLICATION FOR
ORDER SHORTENING TIME OF NOTICE
AND OPPORTUNITY FOR HEARING RE
MOTION TO COMPEL ABANDONMENT**

I, Patrick L. Forte, declare:

1. I am the attorney for debtor herein.

2. Debtor has filed herewith a Motion to Compel Trustee to Abandon Her Interest in Debtor's Residence. Debtor claimed the homestead exemption in her equity in the real property located at 25122 Angelina Lane, #18, Hayward, CA. There has been no objection to the claim of exemption. The trustee is holding this case open while she administers debtor's estate which consists of nonexempt tax refunds.

3. Debtor fears that unless this case is closed or unless the Court compels the trustee to abandon her residence, the equity in the property could increase to a point where the equity is no longer exempt and the Trustee could force the sale of her real property. Time is of the essence

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1 as real property values are appreciating.

2 I declare under penalty of perjury under the laws of the State of
3 California that the foregoing is true and correct.

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5 Dated: July 14, 2017

6 /s/ Patrick L. Forte
7 PATRICK L. FORTE
8 Attorney for Debtor
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